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Attorneys for Defendants, City of Huntington Park, Nick Nichols,  
Rene Reza, Matthew Rincon, April Wheeler, Jose A. Yamasaki, and  
Saul Rodriguez

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his	)	Case No. 2:23-cv-09412 CBM (AGRx)
guardian <i>ad litem</i> Elsa Acosta,	)	<i>Assigned to:</i>
individually and as successor-in-	)	District Judge: Consuelo B. Marshall
interest to William Salgado; C.S., a	)	Magistrate Judge: Alicia G. Rosenberg
minor by and through his guardian <i>ad</i>	)	
<i>litem</i> Elsa Acosta, individually and as	)	STIPULATION FOR ORDER
successor-in-interest to William	)	EXTENDING DISCOVERY AND
Salgado; J.S., a minor by and through	)	MOTION HEARING DEADLINES
her guardian <i>ad litem</i> Elsa Acosta,	)	
individually and as successor-in-	)	
interest to William Salgado; M.S., a	)	
minor by and through her guardian <i>ad</i>	)	
<i>litem</i> Elsa Acosta, individually and as	)	
successor-in-interest to William	)	
Salgado,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
CITY OF HUNTINGTON PARK;	)	
NICK NICHOLS; RENE REZA;	)	
MATTHEW RINCON; APRIL	)	
WHEELER; and DOES 5 through 10,	)	
inclusive,	)	
	)	
Defendants.	)	

1 The Parties in the above-captioned action, through their undersigned counsel,  
2 respectfully stipulate and move this Court for an order extending the Discovery and  
3 Motion Hearing Deadlines as set forth below:

4 The Parties met and conferred.

5 WHEREAS, the Court's In Chambers – Order and Notice To All Parties (ECF  
6 No.: 22) filed on April 30, 2024, set forth the following deadlines:

7 **Fact discovery shall be completed on or before October 30, 2024.**

8 **Initial expert disclosures shall be completed on or before December 2,**  
9 **2024.**

10 **Rebuttal expert disclosure on or before December 31, 2024.**

11 **Expert discovery shall be completed on or before January 15, 2025.**

12 **Settlement conference shall be held on or before January 30, 2025[5].**

13 **Motions shall be set for oral argument on or before February 25, 2025 at**  
14 **10:00 a.m.**

15 WHEREAS, the Parties have not sought a prior request to extend these  
16 deadlines.

17 WHEREAS, on September 3, 2024, the Court ordered that the related cases of  
18 *D.S., et al. v. City of Huntington Park, et al.*, No. 2:23-cv-09412-CBM-AGR<sub>x</sub>, and  
19 *William Castillo-Miranda, et al. v. City of Huntington Park, et al.*, No. 2:24-cv-  
20 04898-CBM-AGR, were consolidated for purposes of discovery and trial. (ECF No.:  
21 38).

22 WHEREAS, on September 17, 2024, Defendants, City of Huntington Park, et  
23 al., filed their Answer to Complaint to the related case of *William Castillo-Miranda,*  
24 *et al. v. City of Huntington Park, et al.*

25 WHEREAS, the Parties believe that a forty-five (45) day extension of the fact  
26 discovery cut-off deadline is necessary and desirable to ensure adequate time for the  
27 Parties to conduct further written fact discovery and to take the depositions of all  
28 percipient witnesses and percipient officers. Because such an extension would impact

1 the other discovery and motion hearing deadlines noted above, the Parties further  
2 believe that a forty (40) day extension of the initial expert disclosure deadline, and a  
3 thirty (30) day extension of the other above-noted deadlines, is necessary to ensure  
4 an orderly and sequential discovery process.

5 WHEREAS, for the above reasons, good cause exists to extend (1) the fact  
6 discovery cut-off date by forty-five (45) days, or to December 16, 2024; (2) the initial  
7 expert disclosure deadline by thirty (30) days, or to January 11, 2025; (3) the rebuttal  
8 expert disclosure deadline by thirty (30) days, or to January 30, 2025; (4) the expert  
9 discovery cut-off date by thirty (30) days, or to February 14, 2025; (5) the deadline  
10 to complete a settlement conference by thirty (30) days, or to March 1, 2025; and  
11 (6) the deadline to hear motions by thirty (30) days, or to April 1, 2025<sup>1</sup> at 10:00 a.m.

12 WHEREAS, the Parties agree that if any discovery deadline is extended in  
13 accordance with this stipulation such that the new discovery deadline is a Saturday,  
14 Sunday, or legal holiday, the deadline will be the preceding day that is not a Saturday,  
15 Sunday, or legal holiday.

16 THE PARTIES HEREBY STIPULATE, AGREE AND REQUEST:

17 That the Court modify the following deadlines as follows:

18 Fact Discovery Cut-off be continued to: December 16, 2024

19 Initial Expert Disclosures be continued to: January 11, 2025

20 Rebuttal Expert Disclosures be continued to: January 30, 2025

21 Expert Discovery Cut-off be continued to: February 14, 2025

22 Deadline to Complete Settlement Conference be continued to: March 1, 2025

23 Deadline to Hear Motions be continued to: April 1, 2025, at 10:00 a.m.

24 All other deadlines contained in the Order and Notice to All Parties (ECF No.:  
25 22) shall remain in full force and effect.  
26

27  
28 <sup>1</sup> April 1, 2025 is the next law and motion hearing date following the proposed 30-day continuance  
of the deadline.

1                   **IT IS SO STIPULATED.**

2                   Respectfully submitted,

3  
4           DATED: October 9, 2024

**ALVAREZ-GLASMAN & COLVIN  
ARNOLD M. ALVAREZ-GLASMAN  
CITY ATTORNEY**

5  
6  
7                   /s/ Roger A. Colvin, Esquire

8                   Roger A. Colvin  
9                   Christy M. Garcia  
10                  Attorneys for Defendants  
11                  City of Huntington Park, et al.

12  
13  
14           DATED: October 9, 2024

**LAW OFFICES OF DALE K. GALIPO**

15                   /s/ Benjamin S. Levine, Esquire

16                   Dale K. Galipo  
17                   Benjamin S. Levine  
18                   Attorneys for Plaintiffs, D.S., et al.

19  
20           DATED: October 9, 2024

**CARRAZCO LAW, A.P.C.**

21                   /s/ Kent M. Henderson, Esquire

22                   Angel Carrazco, Jr.  
23                   Kent M. Henderson  
24                   Christopher L. Holm  
25                   Attorneys for Plaintiffs, William Castillo-  
26                   Miranda, et al.

27                   **Signature Attestation**

28           I, Roger A. Colvin, attest that all signatories listed above, on whose behalf this  
Stipulation for Order Extending Discovery and Motion Hearing Deadlines is  
submitted, concur in the filing's content and have authorized the filing.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the Central District of California – by using the CM/ECF system on October 9, 2024.

I hereby certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Executed on October 9, 2024, at City of Industry, California.

/s/ Maria Luisa Espinosa  
Maria Luisa Espinosa